

Illinois Bell	225 E. Randolph, 29C	Chicago, Illinois
Indiana Bell	240 N. Meridian Street, Room 1483	Indianapolis, Indiana
Michigan Bell	444 Michigan Avenue, Room 1550	Detroit, Michigan
Ohio Bell	45 Erieview Plaza, Room 1500	Cleveland, Ohio
Wisconsin Bell	722 N. Broadway, Floor 13	Milwaukee, Wisconsin

Documented the policies that the Section 272 affiliates have in place for posting these transactions on a timely basis and noted that these procedures are posted on the SBC Internet site at:

<http://www.sbc.com/PublicAffairs/PublicPolicy/Regulatory/affdocs/MethodsProc-Rev.doc>

For the random sample of 100 affiliate agreements and related pricing addendums obtained in Procedure 5 above, performed the following:

- Noted by inquiry and observation that the 100 agreements or pricing addendums were posted for public inspection within 10 days of their occurrence except for the following:
 - SWBT to SBCS – Premise Sales Support Pricing Addendum dated June 4, 2000 was posted to the Internet on July 13, 2000.
 - Nevada Bell to SBCS – Employee Concession Pricing Addendum effective April 1, 2001 was posted to the Internet on May 8, 2001.
 - Nevada Bell to SBCS – Joint Marketing and Sales Support Pricing Addendum effective March 20, 2001 was posted to the Internet on May 8, 2001.
 - For 12 of the 100 postings tested, Internet posting dates could not be verified since these agreements were executed prior to October 8, 1999 and **SBC** did not retain support for the Internet posting dates.

For 39 of the 100 postings tested, support obtained for the Internet posting date was internal correspondence or employee file notes provided by the Section 272 affiliate. These agreements or pricing addendums were posted to the Internet prior to the Section 272 affiliate's implementation of the posting procedures which produce system-generated verification of the posting dates.

7. For nontariffed services and for services for which a prevailing market price ("PMP") has not been established, or which are not subject to agreements filed with a public service commission, documented the SBC BOCs' and the Section 272 affiliates' process for developing fully distributed cost ("FDC"). Documented and identified the type of costs

included in FDC and documented SBC's calculation of FDC for the services selected by the Joint Oversight Team.

The following summarizes the documentation provided by SBC regarding the processes the SBC BOCs and the Section 272 affiliates utilized to develop FDC:

The process employed by the SBC BOCs for developing FDC is documented in OP 125. The SBC BOCs develop an FDC factor that is applied to all service-specific labor costs in order to capture all costs related to the service provided. Types of costs included in the FDC factor include executive and planning salaries and expenses, general and administrative salaries and expenses, and support asset costs. After the FDC factor is applied to the specific labor costs, an inflation factor, a commission assessment factor, and an Affiliate Oversight Group cost factor are also applied to arrive at the rate charged to the Section 272 affiliate for the service. The inflation factor is used to represent any inflation-driven cost changes since the cost study was developed. The commission assessment factor is only used by SWBT and is applied to recover the costs of fees individually assessed by each state and used to fund the state's regulatory commission. The Affiliate Oversight Group factor is applied to recover the costs of salaries, benefits, and overhead related to operations of the Affiliate Oversight Group.

Selected the following services for which FDC studies were tested for the actual development of FDC and types of costs included in FDC:

- Pacific Bell – Business Communications services' FDC study was reviewed. Noted that the types of costs included in the service-specific labor costs included average costs per hour for wages, paid absences, special payments, wage increases, social security, relief, pensions, other benefits, other expenses, support assets, clerical support, supervision, and supervision support. The total service-specific labor cost per hour was then increased by the FDC factor described above, the inflation factor, the Affiliate Oversight Group factor, and the overall markup of 10% mandated by the State of California's affiliate transaction requirements to arrive at the total FDC rate per hour charged to SBCS.
- **SWBT** – Residential service center long distance sales services' FDC study was reviewed. Noted that the types of costs included in the service-specific labor costs included average costs per hour for wages, paid absences and breaks, premium time, wage increases, social security, other benefits, other direct employee-related expenses, support assets, secretarial support, supervision of next level, fully allocated other expenses, general supervision and staff support, and general expenses. The total service-specific labor cost per hour was then increased by the FDC factor described above, the inflation

factor, the Affiliate Oversight Group factor, and the commission assessment factor to arrive at the total FDC rate per hour charged to SBCS.

- SBCS – Switched toll free service and dedicated voice access/data over voice service were reviewed. Noted that types of costs included tariffed and contract rates charged to other entities plus markup factor for overhead costs.

8. For nontariffed services for which a PMP has not been established, or which are not subject to agreements filed with a public service commission, documented the process the SBC BOCs and the Section 272 affiliates follow to make an estimate of fair market value (“FMV”). Obtained documentation of the calculation of the estimate of FMV for the following services selected by the Joint Oversight Team.

Noted, per review of the documentation obtained above, the processes the SBC BOCs and the Section 272 affiliates follow to make an estimate of FMV are as follows:

The SBC BOCs obtain estimates of FMV from an independent third-party source for those services that would reasonably be expected to occur in an open market between unrelated parties. Generally the independent third party is a consultant that obtains price quotes from three to five unaffiliated companies nationwide which perform comparable services in the marketplace. For specific cases where services would not occur in the open market, the Affiliate Oversight Group would work with the Section 272 affiliate to determine the methodology that would best provide a good faith estimate for FMV for those services. The Section 272 affiliates established FMV by internally developing an analysis of rates charged by three major competitors(AT&T, MCI, and Sprint) for comparable services.

Selected the following services for which SBC developed a good faith estimate of FMV and obtained documentation supporting the FMV determinations:

- SWBT – A good faith estimate of FMV was reviewed for Consumer Telemarketing Sales and Referrals services. The development of FMV was determined through independent third-party studies.
- Pacific Bell – A good faith estimate of FMV was reviewed for Marketing and Sales Management services. The development of FMV was determined through independent third-party studies.
- SBCS – A good faith estimate of FMV was reviewed for Switched Toll Free services and Dedicated Voice Access/Data Over Voice services. The development of FMV was prepared internally by comparing rates of comparable services from three major competitors.

9. Obtained a listing and dollar amounts of all services rendered by month by each SBC BOC to each Section 272 affiliate during the first nine months of the Engagement Period and identified services made available to the Section 272 affiliate that were not made available to third parties. SBC represented that the services not made available to third parties included only joint marketing activities. For the first nine months of the Engagement Period, the listings obtained indicated total billings ~~from~~ the SBC BOCs to the Section 272 affiliates for services that were not made available to third parties of \$55,077,209 to SBCS and \$1,386,295 to **ACI**. With Joint Oversight Team approval, selected a judgmental sample of 35 of the largest monthly billed amounts for each service not made available to third parties and compared unit charges to **PMP**, FDC, or **FMV**, as appropriate. The sampled billed amounts totaled \$18,406,566 for SBCS and \$474,829 for ACI. Noted that the sampled amounts were priced at the higher of FDC or FMV, or **PMP** in accordance with the affiliate transaction standards and were recorded in the books of the SBC BOCs in accordance with the affiliate transaction standards, except as listed below:
- Noted in the September 2000 billing from Pacific Bell to SBCS for Consumer Markets Group services, the unit price used for billing was \$1.00 per listing compared to the FDC rate of \$118.42 per hour. No supporting information was provided that converted the FDC rate of \$118.42 per hour to the billed rate of \$1.00 per listing. SBC represented that the rate of \$1.00 per listing was an estimate, which will be true up once a time in motion study rate is established. As of the date of this report, SBC has not provided documentation that this true-up has been made.

Documented, for the sampled items, the amounts the Section 272 affiliate has recorded for the services in its books of record and the amounts the Section 272 affiliate has paid for the services to the SBC BOCs. Payment of all sampled billed amounts by the Section 272 affiliate was verified by tracing the amount billed for service to the monthly invoice, then tracing the invoice amount to an SBC BOC payable account on the Section 272 affiliate's general ledger, and then noting such payable account was cleared through the month-end cash settlement journal entry between the Section 272 affiliate and the parent company.

	Monthly Amounts Selected by the Joint Oversight Team for Testing			
Services Provided from SBCS to SBC BOCs	Month	Total Services Billed to SBC BOCs per Summary Listing	Total Services Billed to SBC BOCs per Detailed Listing by Invoice	Amounts Paid and Recorded by SBC BOCs for Services Provided by SBCS
Switched Toll Free Service to Pacific Bell	March 2001	\$69,681.99	\$69,681.99	\$34,403.47
Switched Toll Free	February	168,038.35	36,858.82	18,947.22

Dedicated Toll Free Service to SWBT	March 2001	3,310.71	0.00	N/A
Dedicated Voice Access/Data Over Voice to SWBT	November 2000	145,593.50	169,735.39	34,152.80
Long Distance Telephone Number to SWBT	February 2001	2,214.91	0.00	N/A
Private Line to SWBT	February 2001	1,473.85	2,472.38	0.00 *

13. Obtained, as of March 31, 2001, the balance sheet of each Section 272 affiliate and a detailed listing of all fixed assets and performed the required procedures as documented in Objective I, Procedure 7 above. SBC represented that only furniture valued at \$5,000 was transferred from the SBC BOCs, either directly or **through** another affiliate, or from other affiliates to the Section 272 affiliates since February 8, 1996. SBC also represented that no items were purchased from the SBC BOCs, either directly or indirectly through another affiliate, or from other affiliates by the Section 272 affiliates from February 8, 1996 through the end of the Engagement Period.
14. SBC represented that the SBC BOCs did not provide to the Section 272 affiliates **any** assets and/or services priced pursuant to Section 252(e) or statements of generally available terms pursuant to Section 252(f) during the Engagement Period.
15. Inquired and SBC represented that no part of the SBC BOCs' Official Services⁵ network was transferred or sold to a Section 272 affiliate from February 8, 1996 through the end of the Engagement Period.
16. Inquired and documented that since February 8, 1996 the only asset transferred from the SBC BOCs to the Section 272 affiliates was furniture valued at \$5,000, transferred in 1996. Obtained representation from SBC that given the **size** of the total transfer, the interstate price cap indices were not impacted, rate base was not reduced, nor was the revenue requirement adjusted to reflect a gain or reduced operating cost due to this transfer.
17. SBC represented that there has been no construction to **reconfigure** the SBC BOCs' telephone network to connect with the Section 272 affiliates from February 8, 1996 through the end of the Engagement Period.

⁵ The words "official services" mean those services permitted by the United States District Court for the District of Columbia in *United States v. Western Elec. Co. Inc.* See 569 F. Supp. 1057, 1098, n.179 (1983) (defined as "communications between personnel or equipment of an Operating Company located in various areas and communications between Operating Companies and their customers"), and its progeny. See also *Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended*, CC Docket No. 96-149, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 21905, 22008, 22054 (1996); cf. *Petition of U S West Communications, Inc./or a Declaratory Ruling Regarding the Provision of National Directory Assistance*, CC Docket 97-172, Memorandum Opinion and Order, paras. 21-22 (FCC 99-133) (Sept. 27, 1999).

OBJECTIVE VII. Determine whether or not the BOCs have discriminated between the separate affiliate and any other entity in the provision or procurement of **goods**, services, facilities, and information, or the establishment of standards.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors' complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, **as** defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement **of** goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory provision or procurement of goods, services, facilities, or customer network services information (excludes CPNI) or the establishment of standards (**no** complaints received)

2. Obtained the SBC BOCs' written procurement procedures, practices, and policies for services and goods provided by each Section 272 affiliate. Noted upon inspection of the documentation obtained that no stated purchasing preferences were contained in the SBC BOCs' procedures. Noted per the documentation obtained that, in order to purchase goods or services from **an** affiliate, there **are** procedures the SBC BOCs must follow to comply with the Section 272 Requirements.

Noted that OP 6 – SBC Supplier Contracting is the SBC BOCs' primary guidance for procurement practices. The procurement process, including the bidding and vendor qualification/selection process, is performed by SBC Services, Inc. (an administrative affiliate) on behalf of all affiliated SBC entities, including the SBC BOCs. Section 4 of OP 6 details the supplier/contractor selection process. This section documents the dissemination process for requests for proposal ("RFPs") and the absence of purchasing preferences favoring the Section 272 affiliates.

Documented that the SBC BOCs' bidding process, the selection process, and how the SBC BOCs disseminate RFPs to affiliates and third parties are part of a six-step contracting process as follows:

Step 1: Needs Assessment – initial identification of the needs, project scope, and the start of the documentation.

- Step 2: Supplier Search – identification of potential suppliers to meet client and company requirements.
- Step 3: Competitive Analysis – determination of quote methodology; competitive quote process or direct awards; and development of decision matrix to be used to evaluate responses.
- Step 4: Supplier Selection and Contract Negotiation – evaluation of supplier responses to RFPs, quotation and information, and negotiation of contracts.
- Step 5: Contract Approval and Documentation – documentation of all required contract documents and procedures required for contract approval including financial analysis summary, project scope documents, financial risk/dependency letter, legal approvals, and executed documents.
- Step 6: Contract Implementation and Administration – implementation and administration of the agreement upon execution by both parties.

Also noted that Section 10.502 of OP 6 includes a description of the requirements and restrictions applicable to transactions with the Section 272 affiliates as specified in Section 272 of the Act. As any procurement activity by an SBC BOC from a Section 272 affiliate would result in an affiliate transaction, OP 6 refers to OP 125 – “*Nontariffed Activities and affiliate Transactions*,” for complete instructions on affiliate transactions. SBC has established written controls to require any SBC BOC purchase from a Section 272 affiliate comply with Section 272, including the SBC BOCs’ nondiscriminatory procurement obligations. The internal control in place is that any nontariffed affiliate transaction must be approved by the Affiliate Oversight Group prior to the purchase; additionally, the approval process includes a review of the SBC BOCs’ nondiscrimination obligations.

3. SBC has represented that there were no SBC BOC procurement awards to Section 272 affiliates during the Engagement Period. In addition, inquired and SBC represented that there were no bids submitted by the Section 272 affiliates to the SBC BOCs during the Engagement Period.
4. Obtained a list of all goods, services, facilities, and customer network services information, excluding CPNI as defined in Section 222(f)(1) of the Act and exchange access services and facilities inspected in Objective IX, made available to each Section 272 affiliate by the SBC BOCs. SBC has represented that the only media used to inform unaffiliated entities of these services is the SBC Internet site, which contains a listing of services provided under tariff and affiliate agreements. Compared all services from the listings above to the SBC Internet site as of July 27, 2001. Based upon the comparison,

Service	Purchased by SBCS from SBC BOCs	Purchased by ACI from SBC BOCs
Local Exchange Services	Yes	Yes
Billing & Collection Services ("B&C")	Yes	Yes
Enhanced Care Services	Yes	No
Account Maintenance Services	Yes	Yes
Equal Access Consulting Services	Yes	No

Obtained a listing of all unaffiliated carriers that purchased the same services from the SBC BOCs and the total amount of each service purchased by each unaffiliated carrier for the nine months ended March 31, 2001. For account maintenance services, carrier codes were provided in lieu of carrier names. Noted during the performance of other procedures that SBCS purchased local exchange services from SWBT totaling \$33,919 for the first nine months of the Engagement Period that were not included on the listing obtained above and, therefore, were not tested in this procedure.

The Joint Oversight Team selected B&C services and local exchange services for March 2001 for testing. Noted that SBCS purchased B&C services from SWBT and ACI purchased B&C services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell. For 38 unaffiliated carriers purchasing B&C services from SWBT and 34 unaffiliated carriers purchasing B&C services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, or Wisconsin Bell, compared the rates, terms, and conditions on their March 2001 billing to the rates, terms, and conditions on the Section 272 affiliates' March 2001 billing from the comparable SBC BOC. The results of this comparison are shown on Attachment A-5a for SBCS and Attachment A-5b for ACI. SBC represented that the differences noted may result from differences in the customer's choices among the following contractual options: invoice billing; message billing; volume discount pricing; standard pricing; per page billing; and/or rate element billing.

SBC also disclosed that certain billings to ACI from the SBC BOCs for B&C services were inaccurately billed to ACI from July 2000 through November 2000. SBC represented that these billing inaccuracies were corrected in December 2000.

Noted that SBCS purchased local exchange services from Pacific Bell and ACI purchased local exchange services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell. As approved by the Joint Oversight Team, requested March 2001 invoices for 18 unaffiliated carriers purchasing local exchange services from Pacific Bell and 10 unaffiliated carriers purchasing local exchange services from Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, or Wisconsin Bell.

Pacific Bell provided copies of Customer Service Records (“CSRs”) for seven billing account numbers (“BANs”) billed to SBCS as of March 2001 and 18 BANs billed to nine unaffiliated carriers. Compared the rates, by Universal Service Order Code (“USOC”), charged to SBCS to those charged to the unaffiliated carriers. For all the USOCs billed to SBCS, noted 16 USOCs that were also billed to the unaffiliated carriers. Noted that of these 16 comparable USOCs, 13 of the rates agreed without exception and three contained differences which are included in Attachment A-5c. SBC represented that the terms and conditions associated with these billings were the same for SBCS and the unaffiliated carriers. Obtained documentation verifying SBCS’s payment to Pacific Bell and Pacific Bell’s receipt of payment for the seven SBCS BANs provided above.

For the local exchange services provided by Indiana Bell, Illinois Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell, SBC provided a file containing USOCs, billed units, and billed amounts for the month of March 2001 for ACI facilities in Rosemont, Illinois; Muncie, Indiana; and Brookfield, Wisconsin, and ten unaffiliated retail customers (SBC was unable to identify and provide unaffiliated carrier information). SBC represented that this file was extracted ~~from~~ the Ameritech Customer Information System (“ACIS”). SBC represented that ACIS does not designate customers as “retail carriers” or “retail non-carriers.” Sorted the information provided by USOC and class of service and compared the rates per USOC charged to ACI and the unaffiliated customers. Noted no comparable USOCs between the ACI location in Rosemont, Illinois, and the unaffiliated retail customers. Noted 30 comparable USOCs and classes of service between the ACI locations in Muncie and Brookfield and the unaffiliated retail customers. Noted that of these 30 comparable USOCs and classes of service, 24 compared to the rates charged to unaffiliated customers without exception and differences were noted in six USOC/class of service comparisons. Attachment A-5c lists the differences noted. SBC represented that tariff rates may **vary** depending on the term length selected by the customer. Obtained documentation verifying ACI’s payment to Illinois Bell, Indiana Bell, and Wisconsin Bell for the ACI BANs listed on the file above.

6. Documented that the SBC BOCs’ process for disseminating information pursuant to CC Docket No. 96-149, *First Report and Order*, Para. 16, about network changes, the establishment or adoption of new network standards, and the availability of new network services to each Section 272 affiliate and to unaffiliated entities is centralized with the SBC Network Services organization. The Network Services organization is made up of employees from SBC Management Services, Inc. Network Services maintains an internal

Intranet page that documents the business requirements, criteria, and process flows for disseminating network standards. SBC uses Internet postings and Accessible **Letters** to notify unaffiliated entities, including the Section **272** affiliates. SBC's procedures address dissemination of information to both the Section **272** affiliates and unaffiliated entities. The documentation supporting the SBC BOCs' process for notification of network changes contains no distinction between notification processes for Section **272** affiliates and unaffiliated entities.

Once a project plan is reviewed, a determination is made by Legal and Regulatory as to whether notice is required. If notice is required, the project is control numbered, then determined **as** either short-term or long-term. Then the notification document is prepared and the project is forwarded on to the Facility Equipment Engineer for preparation of the project package and to the Engineering Single Point of Contact ("SPOC"). The Engineering SPOC reviews the notification document for compliance and then forwards the notification document to the regulatory department. The regulatory department then files the notification document for all long-term projects with the FCC. The regulatory department informs all telephone exchange providers of short-term projects by mail, then files the notification document for short-term projects with the FCC after five days. These notices are posted on the SBC Internet site at <http://www.sbc.com/PublicAffairs>. This section is organized by SBC network disclosures, then by each SBC BOC.

7. Obtained and inspected scripts that SBC BOCs' customer service representatives recite to new customers calling to establish new local telephone service from the three randomly selected call centers in Objective **VII**, Procedure **8**. The call centers selected were located in Lubbock, Texas; Houston, Texas; and Des Peres, Missouri. Per review of these scripts, noted that the scripts contained the following:

- language that attempts to sell interLATA services;
- language that informs the consumers that there **are** other providers of interLATA services; and
- language offering to identify the other providers to the consumer if they **are** interested.

Noted per observation at the call centers that if a customer is interested in hearing the list of other providers, the call center representative clicks a button on the computer screen and a list of all the interLATA service providers is randomly generated and appears on the computer screen. SBC represented that the call center representatives are instructed to read the list of providers until the customer stops them. Further noted that because the list is randomly generated **every** time the customer requests this information, the providers **are** listed in different order so that all providers have the same chance of being read to customers first. Obtained this randomly generated listing from a call center representative and retained it in the workpapers.

Visited the Internet sites of the SBC BOCs, www.swbell.com, www.ameritech.com, www.pacbell.com, www.nevadabell.com, and www.snet.com, noting that the consumers are not informed on the Internet that there are other providers of interLATA services and, therefore, the other providers are not identified **to** the consumers. Further noted that only existing SBC BOC customers are able to order long-distance service over the Internet. Any new customers requesting service are instructed **to** call an SBC BOC representative for service. SBC represented that the equal access disclosure is then made over the telephone **to** the new customers. Obtained SBC representation stating, "the equal access obligation would not be required because such inbound ordering on the **SBC** Internet site of SBC long distance service is limited **to** existing customers." Verified this information per review of the Section **272** Requirements.

8. Observed five SBC BOC service representatives for one-half hour each, at each of the three call centers listed in Procedure **7** above. Noted the service representatives responding **to** inbound callers requesting **to** establish new local telephone service **to** whom the sales representatives attempted **to** market the Section **272** affiliates' interLATA service.

Of the calls monitored, noted **20** calls which related **to** establishing new local telephone service and in which the sales representative informed the customer of other providers of intraLATA and/or interLATA services and informed the customer of their right **to** make the selection. Of the **20** calls, noted **two** calls in which the sales representative attempted to market the Section **272** affiliates' interLATA service. In both calls, the marketing attempt was made after informing the customer of their options and rights.

In addition, listened in on phone calls that were not related **to** the establishment of new telephone service. The primary topics of these calls were technical problems with phone service, requests for additional services (caller ID, voicemail, call forwarding, etc.), and requests for status of in-process orders or disconnects.

9. SBC has represented that the Section **272** affiliates do not have a separate sales force and do not market exchange services on behalf of the SBC BOCs or as a reseller.

OBJECTIVE VIII. Determine whether or not the BOCs and an affiliate subject to Section **251(c)** of the Act have fulfilled requests from unaffiliated entities for telephone exchange service and exchange access within a period no longer than the period in which they provide such telephone exchange service and exchange access to themselves or their affiliates.

1. The procedures used by the SBC BOCs **to** identify, track, respond to, and take corrective action **to** competitors' complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory processing of orders for, and provisioning of, exchange access and exchange services and unbundled network elements, and discriminatory resolution of network problems (*no complaints received*)
2. Obtained the written information disclosure process that the SBC BOCs follow to collect performance data for the documentation of time intervals for processing of orders, provisioning of service, and performance of repair and maintenance services for themselves or their affiliates and for unaffiliated entities for exchange access services and presubscribed interexchange carrier (“PIC”) change orders. Attachment A-6 lists the business rules for the Section 272 (e)(1) performance measurements, as obtained from SBC. SBC represented that the Section 272 affiliates do not resell local or intraLATA toll service and do not lease any unbundled network elements (“UNEs”) from the SBC BOCs.

Noted that the written information disclosure process indicates that the 272 (e)(1) Information Disclosure Report will be produced quarterly, not later than 60 days after the close of the calendar quarter, and reports are available to interested parties upon request.

3. Obtained data tracked and maintained by the SBC BOCs during the first nine months of the Engagement Period, by month and quarter, indicating time intervals for processing of orders (for initial installation requests, subsequent requests for improvement, upgrades, or modifications of service, or repair and maintenance), provisioning of service, and performance of repair and maintenance services for themselves and their affiliates and for unaffiliated entities, as customers, ~~for~~ exchange access services and PIC change orders, as noted in Attachment A-7. SBC represented that the Section 272 affiliates do not resell local or intraLATA toll service and do not lease any UNEs from the SBC BOCs. In addition, noted the differences in time in fulfilling each type of request for the **same** services from the SBC BOCs or their affiliates and ~~from~~ unaffiliated entities.

4. Obtained the data tracked and maintained by SWBT during the Engagement Period in Procedure 3. Provided the results to the Joint Oversight Team. The Joint Oversight Team selected for testing: Performance Measure (“PM”) #1 (Successful Completion According to Customer Desired Due Date) for March 2001 for Oklahoma, PM #5 (Mean Time to Restore) for March 2001 for Kansas, and PM #6 (Time to Restore PIC After Trouble Report) for February 2001 and PM #7 (Mean Time to Clear Network Trouble) for November 2000 for Texas.

Obtained the ~~raw~~ data from SWBT for each PM selected and, using a data analysis program, recalculated selected PMs 1 and 5 without exception. PM 6 was not able to be recalculated as the supporting documentation for the selected month was no longer available. SBC represented that the supporting data used to calculate PM 6 was not retained during the period October 2000 through March 2001 ~~as~~ the system used to calculate PM 6 replaced the prior month data with current month data upon calculation. SBC also represented that in April 2001 SBC began using a different system ~~to~~ calculate PM 6 results and the underlying data is now retained. The Joint Oversight Team selected PM 7 as an alternative. Recalculated PM 7 (Mean Time to Clear Network Trouble) for Texas for the month of November 2000 and noted that measure 7 agreed without exception.

5. SBC represented that the SBC BOCs track and maintain the data as described in Procedure 2 above. Therefore, this step was not applicable.
6. Inquired and documented how the SBC BOCs make available to unaffiliated entities information regarding service intervals in providing any service to themselves or their affiliates and to unaffiliated entities. The service intervals are calculated and validated by the SBC BOCs for SBC and its affiliates and unaffiliated entities. Unaffiliated entities, Section 272 affiliates, and the FCC must contact the SBC BOCs to request service interval results for SBC and its affiliates. The results for SBC and its affiliates are provided to unaffiliated entities upon request. Unaffiliated entities may request the results from their account team contacts within the SBC BOC.

OBJECTIVE IX. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have made available facilities, services, or information concerning its provision of exchange access to other providers of interLATA services on the same terms and conditions as they have to their affiliate required under Section 272 that operates in the same market.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors’ complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards.

- Allegations of discriminatory availability of exchange access facilities (*no* complaints received)
2. Obtained a list of exchange access services and facilities with their related rates offered to each Section 272 affiliate and noted that these services and facilities were made available at the same rates and on the same terms and conditions to all carriers through the use of generally available tariffs. Obtained summaries of all exchange access services and facilities from the relevant SBC Internet site, <https://www2.sbcprimeaccess.com>. SBC notifies carriers through the use of accessible letters that **are** mailed or electronically sent and posted on the Internet at <https://www2.sbcprimeaccess.com>. Obtained the index to the Internet site that listed all accessible letters related to exchange access services and facilities. SBC represented that other media are used such as trade shows, customer meetings, published product guides, etc.; however, these media are only available at different times, such as when a trade show takes place. SBC did not provide examples of these forms of media as none were currently being utilized.
 3. Obtained a listing of all invoices for exchange access services and facilities, by BAN, issued to the Section 272 affiliates by the SBC BOCs for the month of January 2001. From the listings obtained, randomly selected 50 BANs and obtained copies of these invoices. The listing of the total billed amounts for January 2001 and sample selection is summarized below.

Table 8

From SBC BOC	Number of BANs Listed	Total Invoiced Amounts for January 2001	Number of BANs Sampled	Total Sampled Invoices
SWBT	54	\$2,085,829	24	\$1,635,292
Ameritech	181	961,905	19	294,087
Pacific Bell	11	56,032	6	880
SNET	5	638	1	176
Total	251	\$3,104,404	50	\$1,930,435

From the 50 invoices obtained above, extracted 100 different USOCs charged to the Section 272 affiliates. The USOCs selected are documented at Attachment A-Sa. SBC produced a query of these USOCs with associated rates charged to the Section 272 affiliates and 10 unaffiliated carriers from the SBC BOCs' Carrier Access Billing System ("CABS") for the month of January 2001. Using the resulting data from this **query**, compared the rates, by USOC, state, and class of service, charged to the 10 unaffiliated carriers and the Section 272 affiliates. Differences are listed on Attachment A-8b. **For** the USOCs queried, 29 had comparable USOC/class **of** service combinations between the Section 272 affiliates and 10 unaffiliated carriers. Seven of the comparable USOC/class of service combinations billed to other carriers were billed at **rates** different from the rates billed to the Section 272 affiliates. SBC represented that the rate differences were due to the following reasons:

- For USOCs 1J5HS and 1L5XX, variances are due to zone and term differences.
- For USOCs 1OXHX, TUZPX, and 1L5XX, variances are due to volume differences.
- For USOC TMECS, variances are due to zone and term differences.

To test the comparability of terms and conditions offered to the Section 272 affiliates and unaffiliated carriers, the Joint Oversight **Team** approved a judgmental selection of invoices from 13 unaffiliated carriers to compare to the terms and conditions offered to the Section 272 affiliates and affiliated carriers. For the judgmental sample of one invoice from a different unaffiliated carrier from each of the 13 states served by SBC, compared the terms and conditions and noted no differences.

4. For the 50 invoices obtained in Procedure 3 above, attempted to trace the amount invoiced for exchange access services to each Section 272 affiliate and determine whether **the** amount invoiced was recorded by the SBC BOC and paid by the Section 272 affiliate. For 25 of the 50 invoices determined that the SBC BOCs recorded the amounts invoiced and that SBCS paid the amounts invoiced, with the exception of one invoice in which there was a difference of \$590.29 between the amount charged by the SBC BOC and the amount paid by SBCS. SBCS did not provide documentation of payment for six of the 50 invoices from Procedure 3 above, totaling \$49,568.35. SBCS represented that these invoices did not relate to the Section 272 affiliate and were improperly included in the listing of invoices obtained in Procedure 3 above.

Nineteen of the 50 invoices obtained in Procedure 3 above related to ACI. SBC provided no payment **or** receipt documentation, from either ACI **or** the SBC BOCs, relating to these BANs. SBC represented that these BANs were assigned to Williams Communications as of September 30, 2000 and after this date ACI was no longer responsible for payment of these accounts. These accounts were improperly included in the listing of invoices obtained in Procedure 3 above.

OBJECTIVE X. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have charged their separate affiliate **under** Section 272, or imputed to themselves (if using the access for their provision of their own services), an amount for access to their telephone exchange service and exchange access that is no less than the amount charged to any unaffiliated interexchange carriers for such service.

1. SBC has represented that there are no written agreements, other than tariffs, that Section 272 affiliates and other interexchange carriers (“IXCs”) have with the SBC BOCs for exchange access services. Exchange access services are offered via tariff.
2. Inquired of SBC and documented at Attachment A-9 those LATAs of the SBC BOCs that have price flexibility for interLATA interstate and interLATA intrastate access services.
3. As noted in Procedure 1 above, SBC has represented that the Section 272 affiliates and other interexchange carriers do not have written agreements other than tariffs with the SBC BOCs for exchange access services. Therefore, no testing was performed.
4. Obtained a list of five interLATA services offered by the SBC BOCs and discussed the list with the appropriate SBC representative, who indicated that the list was comprehensive. Compared the services appearing on the list **with** the incidental interLATA services disclosed in the SBC BOCs’ CAM and noted no differences. Compared the nonregulated incidental interLATA services listed in the SBC BOCs’ CAM with those defined as incidental in Section 271(g) of the Act and those interLATA services allowed under FCC order and noted no differences.
5. Obtained a statement of revenue, by month, of incidental interLATA services provided by the SBC BOCs for the first nine months of the Engagement Period, and performed a trend analysis. For increases of more than 10% from month to month, inquired of SBC and obtained explanations for the differences as noted below:

Table 9

SWBT
Service: E911
Trend: Revenues decreased from \$712,863 in August 2000 to a deficit of \$1,867,598 in September 2000. Revenues then in turn increased to \$2,087,514 in October 2000.
SBC Explanation: The fluctuations are a result of a customer credit in September 2000 and the subsequent correction in October 2000. Customer credits in September 2000 reflect the loss of a Texas customer to another provider. The credits should have been split between regulated and nonregulated revenues but were all booked to the non-regulated revenues account. The October increase reflects the adjustment to reclassify the appropriate credit amount to the nonregulated account.

Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell
Service: E911
Trend: Revenues increased from \$3,280,043 in July 2000 to \$3,897,885 in August 2000.
SBC Explanation: The fluctuation is a result of credits for previous over-billings in Indiana and an erroneous journal entry crediting a one-time SONET charge to the 911 product account.
Trend: Revenues increased from \$3,208,679 in September 2000 to \$6,434,984 in October 2000. Revenues increased from \$2,159,239 in November 2000 to \$3,253,488 in December 2000.
SBC Explanation: The fluctuations are a result of year to date corrections in Indiana during October 2000 for 911 revenues erroneously booked to Centrex and SONET revenues erroneously booked to 911 and subsequently reversed in November 2000.

SWBT
Service: National Directory Assistance
Trend: Revenues increased from \$2,613,987 in July 2000 to \$10,263,614 in August 2000. Revenues increased from \$1,275,258 in September 2000 to \$2,172,824 in October 2000 and \$2,405,035 in November 2000. Revenues increased from \$1,531,752 in December 2000 to \$2,662,115 in January 2001.
SBC Explanation: The fluctuations are due to an ongoing reclassification of National Listing Service (“NLS”) revenues from local to nonregulated revenues. A year to date reclassification occurred in August 2000 causing the significant upward fluctuation in revenues.
Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell
Service: National Directory Assistance
Trend: Revenues increased from \$2,303,756 in August 2000 to \$2,588,828 in September 2000. Revenues increased from \$1,994,509 in January 2001 to \$2,402,939 in February 2001.
SBC Explanation: The fluctuations are a result of manual journal entries associated with wholesale billing of services. These manual journal entries are received and booked every two to three months and are not recorded on a monthly basis. In addition, SBC has represented that for any usage-based charge, month-to-month swings are considered normal. However, in the case of the wholesale market, these swings are more pronounced.

Pacific Bell
Service: National Directory Assistance
Trend: Revenues increased from \$1,744,399 in July 2000 to \$2,102,566 in August 2000. Revenues increased from \$1,634,913 in December 2000 to \$1,891,697 in January 2001.
SBC Explanation: The fluctuations are a result of a mechanized accrual and reversal

process, embedded in the billing system, for unbilled usage. This process is used to associate the billing with the same month as the usage (e.g., January usage billed in February is treated as revenues earned in January). In addition, a price increase took effect in January 2001.
SWBT
Service: SS7 Signaling (Line Information Data Bases (“LIDB”), Calling Name (“CNAM”), etc.)
Trend: Revenues increased from \$356,920 in September 2000 to \$6,312,727 in October 2000. Revenues increased from a deficit of \$253,789 in November 2000 to \$1,783,146 in December 2000 and to \$2,391,075 in January 2001. Revenues increased from \$80,613 in February 2001 to \$1,686,849 in March 2001.
SBC Explanation: The fluctuations are a result of SBC’s migration of LIDB and CNAM billing from both the mechanized and manual Pacific Bell billing systems to the SWBT mechanized billing system. The fluctuations are a result of billing errors, and subsequent corrections, associated with this billing change. The SWBT billing system not only billed the Pacific Bell customers but also billed Pacific Bell for service. In addition, fine-tuning the transition from manual billing to mechanized billing caused considerable “out of period” billing.
Pacific Bell
Service: SS7 Signaling (LIDB, CNAM, etc.)
Trend: Revenues increased from \$225,693 in August 2000 to \$983,375 in September 2000. Revenues increased from \$332,181 in October 2000 to \$3,707,965 in November 2000.
SBC Explanation: The fluctuations are a result of SBC’s migration of LIDB and CNAM billing from both the mechanized and manual Pacific Bell billing systems to the SWBT mechanized billing system. The fluctuations are a result of billing errors, and subsequent corrections, associated with this billing change. The SWBT billing system not only billed the Pacific Bell customers but also billed Pacific Bell for service. In addition, fine-tuning the transition from manual billing to mechanized billing caused considerable “out of period” billing.

6.

7. For exchange access services and local exchange services, documented, in the table below, the total amount that the Section 272 affiliates recorded on their books and compared it to the total amount that the Section 272 affiliates paid to the SBC BOCs for these services and to the amount of corresponding revenue reflected in the SBC BOCs' books during the nine months ended March 31, 2001. SBC represented that the Section 272 affiliates purchased no unbundled network elements from the SBC BOCs during the Engagement Period. Noted, **through** inquiry, that SBCS purchased local exchange service from Pacific Bell and SWBT and exchange access service from SWBT, Pacific Bell, Illinois Bell, Indiana Bell, and Michigan Bell. ACI purchased both exchange access and local exchange service from Illinois Bell, Indiana Bell, Michigan Bell, Ohio Bell, and Wisconsin Bell and exchange access service from SWBT.

Table 10

For the Nine Months Ended March 31, 2001	SBCS Exchange Access Service	SBCS Local Exchange Service from Pacific Bell	SBCS Local Exchange Service from SWBT	ACI Exchange Access Service	ACI Local Exchange Service
Amount recorded on books of Section 272 affiliate	\$14,718,835	\$420,026	\$33,919	\$5,089,865	\$619,791
Amount paid by Section 272 affiliate to SBC BOCs	11,654,368 11,654,368	420,026 420,026	28,973	4,545,256	619,791
Amount of corresponding revenue recorded by SBC BOCs	14,415,927	418,828	23,411	4,566,772 4,566,772	380,675 ⁶ 380,675 ⁶

SBC represented that all of ACI's exchange access service and local exchange service were transferred to Williams Communications on October 1, 2000 and most of the ACI differences noted above are due to the SBC BOCs' continuing to record after October 1, 2000 as ACI revenue instead of revenue from Williams Communications.

SBC represented that differences between the Section 272 affiliates' recorded amounts and the SBC BOCs' recorded amounts are also due to the Section 272 affiliates' including tax amounts in their totals, while tax amounts are excluded from the SBC BOC

⁶ SBC represented that the recorded amount of SBC BOC local service revenue included amounts from ACI for the period August 2000 through March 2001 as July 2000 detail revenue amounts were no longer available.

amounts, and timing differences, such as when the SBC BOC records revenue in one month while the affiliate pays the bill and records the expense in a subsequent month. SBC also represented that amounts under dispute from SBCS for exchange access service from the SBC BOCs total \$2,964,768.

OBJECTIVE XI. Determine whether or not the BOCs and an affiliate subject to Section 251(c) of the Act have provided any interLATA facilities or services to their interLATA affiliate and made available such services or facilities to all carriers at the same rates and on the same terms and conditions, and allocated the associated costs appropriately.

1. The procedures used by the SBC BOCs to identify, track, respond to, and take corrective action to competitors' complaints are documented in Objectives V and VI, Procedure 1.

Obtained from the SBC BOCs a list of all FCC formal complaints, as defined in 47 CFR 1.720; FCC informal complaints, as defined in 47 CFR 1.716; and any written complaints made to a state regulatory commission from competitors filed during the first nine months of the Engagement Period involving alleged noncompliance with the Section 272 Requirements, including complaints submitted by competitors related to the provision or procurement of goods, services, facilities, and information, or in connection with the establishment of standards. Noted three complaints filed during the Engagement Period. Of the three complaints filed during the first nine months of the Engagement Period, noted that two complaints were resolved while one remained open and under investigation.

- Allegations of discriminatory availability of interLATA facilities or services not at the same rates and not on the same terms and conditions as the interLATA affiliates (three complaints received)
 1. On September 22, 2000, AT&T Communications of Texas, L.P. filed a complaint with the Public Utility Commission of Texas alleging that the long distance rates offered in Texas by SBCS did not cover its own operating expenses, and thus were being subsidized by SWBT. The Public Utility Commission of Texas has scheduled a hearing regarding this complaint on December 17, 2001.
 2. On April 27, 2001, AT&T Communications of the Southwest, Inc. filed testimony in SBCS's application with the Oklahoma Corporation Commission ("OCC") to determine if its interexchange services are subject to effective competition, alleging that SBCS had a competitive advantage over other IXCs since SWBT's access charges were not based on costs. On June 12, 2001, the OCC issued an order in SBCS's favor determining that SBCS was subject to effective competition.

3. On March 6, **2001**, AT&T Communications of the Southwest, Inc. filed an emergency motion in SBCS's tariff approval docket pending with the Kansas Corporation Commission, alleging that SBCS's rates were unlawful, unduly, preferential, and anti-competitive. On May 15, 2001, an agreement was reached between SWBT, AT&T, and others that reduced SWBT's intrastate access rates to parity with SWBT's interstate access rates, and AT&T agreed to withdraw its complaints in SBCS's tariff proceedings.
2. SBC represented that there is not a list of interLATA network services and facilities with their related rates offered by the SBC BOCs to the Section **272** affiliates. All rates charged to the Section **272** affiliates and unaffiliated carriers for interLATA network services and facilities are tariffed rates and are publicly available on the Internet. Obtained a list of tariffs showing rate information for the interLATA network services and facilities offered by the SBC BOCs to the Section **272** affiliates.

Obtained invoices for interLATA network services and facilities for one month rendered by the SBC BOCs to the Section **272** affiliates and other IXC's that received services from the SBC BOCs. The Joint Oversight Team, after discussions with SBC, selected November **5,2000** billings to SBCS and one unaffiliated carrier for testing.

3. The November **5, 2000** billings to SBCS and the unaffiliated carrier included one invoice each. Inspected underlying details of the invoice to SBCS and the invoice to the unaffiliated carrier and compared rates charged and applied to SBCS and the unaffiliated carrier and noted that there was only one USOC that resulted in charged amounts. This USOC was detailed in four instances on each invoice. Compared each instance noting no variance among the invoices.

SBC represented that the USOC PT8JX is for a Dedicated End Office Trunk in SWBT FCC Tariff 73 Page 6-185. The rate listed in the tariff was **\$18.00**. Both SBCS and the unaffiliated carrier were charged the **\$18.00** rate for this USOC on the November **2000** invoice. No rate difference was noted.

The remaining USOCs detailed on each invoice were the same, each with no charge denoted. Additionally, noted the basic monthly access charge for SBCS was **\$828.00, 46** units at \$18.00 each, with an additional tax of \$81.93 for federal taxes and local state tax (Kansas); this brings SBCS's monthly access charge to a total of approximately \$910.00. The basic monthly access charge for the unaffiliated carrier was **\$864.00, 48** units at \$18.00 each; noted a tax-exempt *status* per the unaffiliated carrier's invoice detail. SBC represented that the variance in the total monthly access charge between SBCS and the unaffiliated carrier is due to the unaffiliated carrier ordering two more services and the unaffiliated carrier's tax-exempt status.

Noted that the terms and conditions detailed on the bills to SBCS and the unaffiliated carrier were the same.

SBC represented that ACI did not receive interLATA services from the SBC BOCs during the Engagement Period.

4. Using the invoices obtained in Procedure 3 above, traced the amount invoiced to the Section 272 affiliate for interLATA facilities and services and determined the amount invoiced was the amount recorded by the SBC BOC and paid by the Section 272 affiliate. For this purpose, obtained screen prints from SBCS's accounting system that detailed customer account and payment history. Additionally, obtained screen prints from the SBC BOC that showed the amount booked as revenue. Additionally, agreed the dollar amount per the SBC BOC accounting system to the payment amount per SBCS's accounting system. Obtained the voucher payment support from SBCS for the payment made. Documentation obtained from SWBT indicated that SBCS paid the November 5, 2000 invoice on January 17, 2001. Obtained copies of SBCS's December 5, 2000 invoice from SWBT for this account and noted that late fees related to the unpaid balance from the November 5, 2000 invoice were charged to SBCS on the December 1 invoice from SWBT.

In addition to the procedures discussed above, SBC made the following representations regarding compliance with the Section 272 Requirements:

- In an Ex Parte letter to the FCC dated August 8, 2000, SBC disclosed the circumstances leading to a delay in compliance with the nondiscriminatory requirements under Section 272 (c)(1) related to Ameritech's offering of in-region nonlocal directory assistance.
- SBC represented that disclosure was made to the FCC on September 29, 2000 regarding Pacific Bell's provision of interLATA foreign exchange service to approximately 30 customers in California. SBC represented that this results from the customers claiming that Pacific Bell has a grandfathered obligation to provide service across the LATA boundary. This claim is currently under review by the California Public Utilities Commission.

Section 272 Affiliates
Employees and Departments by Location

Attachment A-1
Objective I, Procedure 3

ACI

			Department							
Location			Affiliate Services	Billing and Revenue Assurance	Customer Care	Finance	Network Operations	Network Planning and Engineering Data and Voice	Operator Services	Total
Street Address	City	State								
310 W. Wisconsin Ave.	Milwaukee	WI							34	34
3773 South Madison Avenue	Muncie	IN							102	102
555 So. Executive Drive	Brookfield	WI	1				69	8		78
9450 West Bryn Mawr Ave.	Rosemont	IL			146					146
9525 West Bryn Mawr Ave.	Rosemont	IL	10	58	4	1		7	4	84
Total			11	58	150	1	69	15	140	444

SBCS

Department		Location: 5850 West Las Positas Blvd., Pleasanton, CA
Affiliate Services		25
Billing and Revenue Assurance		2
Business operations		36
customer Care		92
Employee Communications		9
Finance		30
Legal		1
Marketing		32
Network Operations		6
Network Planning and Engineering		9
President of SBCS and ACI		1
product Design and Architecture		12
Product Design and Development Data		13
Product Development		27
Regulatory		16
Total		

Suppliers Providing Operations, Installation, and
Maintenance Over Transmission and Switching Facilities

Attachment A-2
Objective I, Procedure 5

Vendor	Section 212 Affiliate	Section 212 Affiliate Location
Planning and Engineering		
Vendor A	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor B	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor C	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor D	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor E	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor F	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor D	SBCS	5850 West Las Positas Blvd., Pleasanton, CA
Network Operations		
Vendor G	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor H	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor I	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor J	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor K	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor L	ACI	9525 West Bryn Maw Ave., Rosemont, IL
Vendor G	SBCS	5850 West Las Positas Blvd., Pleasanton, CA
Vendor K	SBCS	5850 West Las Positas Blvd., Pleasanton, CA
Vendor L	SBCS	5850 West Las Positas Blvd., Pleasanton, CA

Note: **SBC** represented that the OI&M services listed above were received by the Section 272 affiliates throughout their systems; therefore an individual location of the service provided was not feasible. Therefore, the primary address of the Section 272 affiliate is listed as the receiving location.